

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates:

PLAINTIFF(S)

16-cv-01895 (*Eney v. 3M Co., et al.*)
16-cv-03934 (*Hougen v. 3M Co., et al.*)
17-cv-02450 (*Knapke v. 3M Co., et al.*)
17-cv-02453 (*Hughes v. 3M Co., et al.*)
17-cv-02455 (*Nugent v. 3M Co., et al.*)
18-cv-00104 (*Blevins v. 3M Co., et al.*)
17-cv-04859 (*Bradford v. 3M Co., et al.*)
17-cv-04860 (*Mack, v. 3M Co., et al.*)
18-cv-00347 (*Watson v. 3M Co., et al.*)
17-cv-00349 (*Baxter v. 3M Co., et al.*)
17-cv-03997 (*Keith v. 3M Co., et al.*)
18-cv-00167 (*Shoaf v. 3M Co., et al.*)

**MILLER FIRM LLC, DECLARATION IN SUPPORT OF SUPPLEMENTAL
OPPOSITION TO DEFENDANT’S MOTION TO SHOW CAUSE**

I, Tayjes Shah, declare as follows:

1. I am an attorney at The Miller Firm, LLC and Counsel for above captioned Plaintiffs.

2. I submit this declaration in support of the Miller Firm, LLC’s Supplemental Opposition to Defendants’ Motion for Order to Show Cause Why Cases Should Not be Dismissed for Lack of Product Identification or Product-Related Injury [Dkt. 1380].

3. SharePoint file sharing reflects that Defendants were served with responsive medical records accompanying the PFS productions in the following cases and on the following dates:

Eney- 7/17/17

Hougen- 7/17/17
Knapke - 10/13/17
Hughes – 10/18/17
Nugent- 10/13/17
Blevins – 3/9/2018
Bradford- 1/11/2018
Mack- 11/27/2017
Watson- 3/28/2018
Baxter – 6/16/2017
Keith – 12/14/2017
Shoaf – 3/20/2018

4. The medical records reflect specific Bair Hugger Product identification for Eney, Hougen, Knapke, Nugent, Blevins, Bradford, Mack, and Watson and forced air warming device identification for Baxter, Hughes, Keith, and Shoaf

5. Plaintiff did not receive notice of Defendants’ intent to file the instant Motion until July 27, 2018.

6. On July 31, 2018, Plaintiff promptly contacted Defense Counsel via email indicating proof of product identification and specifically attaching medical records containing the product identification to the 12 cases at issue. See Exhibit A.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: 8/6/2018

Respectfully submitted,

s/Tayjes Shah

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CERTIFICATE OF SERVICE

This is to certify that on August 6, 2018 a copy of the foregoing document was served on all parties via the Court's electronic filing system.

Respectfully submitted,

s/Tayjes Shah

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